

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOSE CALVENTE,

Plaintiff,

-against-

SUFFOLK COUNTY CORRECTIONAL FACILITY,

Defendants.

**DEFENDANT'S INITIAL
NARRATIVE STATEMENT**

**CV15-2024
(JFB)(ARL)**

Defendant Suffolk County Correctional Facility submits the following as and for its initial narrative statement.

I. FACTS

Defendant intends to offer evidence of the following facts at trial:

- a) that plaintiff was not deprived of his right to adequate medical care; and
- b) that plaintiff did not sustain the injuries and damages which he claims.

II. EXHIBITS

Defendant intends to offer the following evidentiary items:

- a) plaintiff's medical chart from the Suffolk County Correctional Facility.
- b) plaintiff's medical chart from the New York State Department of Corrections.

III. WITNESSES

Defendant intends to call Dr. Vincent Geraci as a witness at trial.

Dated: Hauppauge, New York
December 4, 2015

Dennis M. Brown
Suffolk County Attorney
Attorney for Defendant
Arlene S. Zwilling
P.O. Box 6100
100 Veterans Memorial Highway
Hauppauge, New York 11788-0099
(631) 853-4049

By: _____
Arlene S. Zwilling
Assistant County Attorney

To: Jose Calvente *Pro Se*
14A5049
Marcy Correctional Facility
PO Box 3600
Marcy, NY 13403-3600